



UNION CARBIDE CORPORATION

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December 20, 1988

Ms. Janet Feldstein USEPA Region II

SUBJECT:

USEPA APPROVAL

POP REVISION NOS. 8 AND 9

SCP CARLSTADT RI/FS

Dear Ms. Feldstein:

Attached is the letter from Dames & Moore stating their agreement to the changes to Revision Nos. 8 and 9 in the Project Operations Plan. In regard to paragraph 7.15.5.5, we shall drum the fluids generated and hold them on site until laboratory analysis is available to determine the proper method of disposal. In a teleconference on December 19, 1988 the PRP Group Executive Committee endorsed this agreement.

Very truly yours,

H. G. Weil

Facilities Coordinator

HGW/smd/145+

CC: Mr. Raymond Basso - USEPA Region II

Mr. Thomas Armstrong - General Electric

Mr. William Warren - Cohen, Shapiro

December 12, 1988

Mr. William Warren Princeton Pike Corporate Center 997 Lenox Drive, Bldg. 3 Lawrenceville, New Jersey 08648

Re: USEPA Approval

POP Revision Nos. 8 and 9

SCP Carlstadt RI/FS

Dear Mr. Warren:

In their approval letter of November 29, 1988, the USEPA attached changes to Revision Nos. 8 and 9 to the March 4, 1988 Project Operations Plan. This letter serves as Dames & Moore's agreement to incorporate these changes into the program, subject to the PRP Committee's approval. Additional information is requested by the Agency in several of their changes, and these are addressed along with a few a few comments below:

7.15.5.4 and 7.16.6.4

The Agency has assumed that all fluids generated will be contaminated. While we may not agree with this assumption, the fluids will nevertheless be collected.

7.15.9.1 and 7.16.10.1

For sulfate analysis of water samples, the following details apply:

- a) Method USEPA Method 375.3
- b) Container polyethylene or glass
- c) Preservation cool, 4°C
- d) Holding Time 28 days

7.16.6.6

Approximately eight till soil samples will be collected for priority pollutant analysis during the drilling of the initial bedrock well in the vicinity of well cluster MW-2. Based on the stratigraphy of boring MW-2D (adjacent to which the initial bedrock well will be located), we estimate that the sampling intervals will occur at each of the seven changes in material type, plus an additional sample near the top of bedrock. If an insufficient quantity of material is recovered from a sampling interval to allow full priority pollutant analysis, the

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primary analysis for that interval will be for volatile organic compounds, followed by base/neutral extractable compounds (as material quantity permits).

7.15.5.7 (additional; not in response to USEPA requirement)

For soil samples collected for chemical analysis, the procedures described in POP Section 7.8.5.6 will be followed. We plan to collect eight soil samples from within the clay during drilling of the four off-site till wells (two from each well location: one near the middle of the clay unit and one near the bottom of the clay unit). These samples will be analyzed for priority pollutants.

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We plan to commence field work on Monday, December 19, 1988, assuming that the well permit issue is resolved by then. We expect that, at a minimum, the five shallow off-site wells will be installed the first week. The driller shuts down operations during Christmas week, so field work will resume on Tuesday, January 3, 1988.

Please call if you have any questions.

Very truly yours,

DAMES & MOORE

Gerard M. Coscia, P.E.

Project Manager

GMC/jhm

cc: Mr. Gil Weil